

LOL-HECO-IR-16

Ref: "an Executive Team of which I was designated to be the Chairperson was formed." (HECO T-1, page 11, lines 17-18)

Question(s):

- a. When was the Executive Team (ET) formed?
- b. Who formed it?
- c. Who does it report to?
- d. How many meetings did Executive Team hold?
- e. Please provide a copy of the Executive Team's agendas for each of its meetings.
- f. What directives, work orders, etc., did the ET receive from upper management?

HECO Response:

- a. The Executive Team was formed on July 25, 2002.
- b. T. Michael May, President and Chief Executive Officer of Hawaiian Electric Company, Inc., formed the Executive Team.
- c. The Executive Team reports to T. Michael May.
- d. The Executive Team met approximately twenty-two times.
- e. HECO objects to the request for meeting agendas (which were bulleted items to be discarded after each meeting and were not made for every meeting) on the grounds that attorneys were asked to report at the meetings, and the production of agendas could disclose the subject matter of attorney-client communications that are protected by the attorney-client privilege.
- f. HECO objects to providing the "directive, work orders, etc.", as these documents are privileged and confidential and should not be provided on public policy grounds. In addition, HECO objects to the request for the "directives, work orders, etc." the "ET

receive[d] from upper management” on the grounds that the reference to “directives, work orders, etc.” is vague, ambiguous and overly broad. However, without waiving any objections, the Executive Team was directed to provide senior executive oversight to the East Oahu Transmission Project and to bring the project to closure.